September 13, 2012

Honorable U.S. Senator Mary Landrieu

Dear Senator Landrieu,

The New Orleans to Venice (NOV) Louisiana Hurricane Protection Project and the Non-Federal Levee (NFL) incorporation into the NOV project collectively received more than \$1.4B from supplemental bills (3<sup>rd</sup>, 4<sup>th</sup>,6<sup>th</sup> and 7<sup>th</sup>) post-Katrina. At the time funding was approved, based on use of the Engineering Manual Guideline (EM), it was thought that the amount of funding received would be sufficient to complete the existing fifty (50) year level of risk reduction (LORR) for the existing NOV projects and incorporate NOV into the existing projects. The intent of the funding included incorporation of the thirty four (34) miles of existing small public and private back levees on the west bank of Plaquemines Parish from Oakville, Louisiana to St. Jude into the federal system.

In February 2010 the U S Army Corps of Engineers informed Parish President Billy Nungesser that the funding in hand was inadequate to complete the work due to a fundamental change in the post Hurricane Katrina Design Guidelines. The new Hurricane Storm Damage Risk Reduction System (HSDRRS) guidelines would require an additional \$ 1.0B to complete. As a result of this decision Plaquemines Parish is now faced with the possibility of completion of only twenty (20) miles of levee construction instead of thirty four (34) miles for the newly incorporated section from Oakville to St. Jude on the west bank and leaving parts of the existing NOV projects unconstructed.

In July 2011 the U S Army Corp of Engineers hosted a three (3) day Project Delivery Summit for the combined NOV projects. The objective was to optimize project features, establish a completion schedule, reduce costs, and deliver a system-wide protection plan within the budgeted and available funding. A plan was put together with over one hundred (100) participants including USACE, OCPR and PPG. A comprehensive system approach included analyzing the existing factor of safety, height deficiencies and overtopping. This summit resulted in a plan that would optimize all polders in the Federal and Non-Federal sections, and implement the needs expressed by the parish and the state.

This plan was scheduled to be delivered to Major General Walsh on August 22, 2011. General Walsh however unilaterally decided on August 19, 2011 to implement the new HSDRRS design guidelines without reviewing or discussing the aforementioned summit results. This decision by General Walsh is not supported by the data from the summit. While we might agree that given that the infrastructure costs in other parishes are much greater, a 1% 100 year risk reduction system may be needed for Orleans, Jefferson and St. Bernard Parishes, we believe that here in Plaquemines Parish our 2% 50 year risk reduction system satisfies community needs. To require this new 1% HSDRRS design for our parish is an enormous waste of federal money on a design that delivers less protection, an incomplete protection system with gaps, and, because of the resulting gaps in the levee system, does not achieve the congressional objectives for a complete "risk reduction system." In point of fact, the stated objective of the original authorization design was to

protect all of LA State Hwy 23, not a piece of it. The decision by General Walsh does not conform to the objective.

Two weeks ago Hurricane Isaac came through Plaquemines Parish resulting in more than 7.5 feet of water in the same areas where federal levees were originally proposed to be constructed. If General Walsh's HSDRRS decision is allowed to stand we would still have flooded Hwy 23 on the south end of the project.

Hwy 23 is our only evacuation route. The primary reason for including this area in the federal protection supplemental was to protect this evacuation route. As it currently stands we will now be fourteen (14) miles short of a complete "risk reduction" levee protection system. It means fourteen (14) miles of water over Hwy 23, cutting our parish in half and making evacuation difficult if not impossible while ensuring a continued negative economic impact for both our residents and our businesses which, as we all know, will adversely affect the national interests.

Our simple request is to reinstate the original Engineering Manual Guidelines. If the Engineering Manual (EM) guidelines were to be reinstated for this project, we can complete the full thirty four (34) miles of needed protection thereby eliminating the flooding of Hwy 23. This would in turn allow the doors of our homes, communities, and businesses to remain open. (As a sidebar; the EM guideline is the standard every levee system outside of the New Orleans area is built to).

It is noteworthy that the existing ninety (90) miles of federal levees from St. Jude to Venice and from Phoenix to Bohemia were built to the EM standards. It is also noteworthy that we had no failures or overtopping of the federal levees during Hurricane Isaac.

Enclosed are a few pictures of the effects of Hurricane Isaac. Had the levees been built to the EM standard as proposed, most likely our homeless residents would today be living in their homes and not a shelter; local, state and federal governments would be able to put much needed resources to other uses in this recovery; and the oil and gas industries would have been able to access their businesses and get back in business much sooner.

We ask for your support in helping to reinstate the original Engineering Manual Guidelines for the full thirty four (34) miles of the New Orleans to Venice (NOV) Louisiana Hurricane Protection Project (The "NFL"), and help us fast track construction of this important project.

Sincerely William "Billy" Nungesser Parish President